

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Magistrate No. 20-801
	)	[UNDER SEAL]
TYRONE JACKSON	)	

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Sean P. Kiley, being duly sworn, do depose and state the following:

**INTRODUCTION**

1. I am a Deputy of the United States Marshals Service and have been so employed since August 2002. I am currently assigned to the Western Pennsylvania Fugitive Task Force (WPAFTF), which is composed of federal, state and local law enforcement officers investigating federal, state and local fugitives. I have received specialized training at the Federal Law Enforcement Training Center in Glynco, Georgia. I have been involved in numerous fugitive investigations dealing with fugitives wanted for various crimes including violent crimes, narcotics violations, and white collar crimes. While conducting various investigations, I have utilized a variety of investigative techniques and resources. These techniques include physical and electronic surveillance, telephone call analysis, and informants and cooperating sources. Throughout my tenure as a Deputy United States Marshal (DUSM), I have interviewed and interrogated many people, and this information has led to the apprehension of numerous fugitives.

2. I have knowledge of the facts set forth in this affidavit based on my own participation in this investigation and based on information provided to me by others mentioned herein.

**PURPOSE AND SCOPE**

3. This Affidavit is submitted in support of a criminal complaint charging a fugitive,

Tyrone Jackson (JACKSON), with violating Title 18 United States Code, Section 1073, Unlawful Flight to Avoid Prosecution.

### **FACTUAL BACKGROUND**

4. From April 2, 2020, until the present date, the U.S. Marshals Service (USMS) Western Pennsylvania Fugitive Task Force (WPAFTF) has been conducting an investigation into the whereabouts of Tyrone JACKSON.

5. The elements of the underlying Pittsburgh Bureau of Police (PBP) case in OTN# G 863524-4 are that on March 24, 2020, near 3241 Brighton Rd, Pittsburgh, PA 15212 (North Side), it is alleged that JACKSON fired multiple shots into a '01 Volkswagen Passat striking front seat passenger, Jordan GREENING two to three times. GREENING was rushed in the Passat to Allegheny General Hospital on the North Side. Prior to the shooting, GREENING and JACKSON had words and JACKSON lifted his hoodie pulling a firearm out of his waistband and firing it into the Passat that GREENING had just entered. Since March 2020, PBP has been unable to locate JACKSON around Pittsburgh and/or Allegheny County. JACKSON is still at large and his whereabouts are unknown.

6. On April 2, 2020, PBP requested assistance by the United States Marshals Service (USMS) WPAFTF in apprehending Tyrone JACKSON. WPAFTF member, Deputy U.S. Marshal (DUSM) Sean P. KILEY and Task Force Officer (TFO) Joseph NOVAKOWSKI were assigned the state fugitive investigation. JACKSON is currently wanted on an outstanding state felony arrest warrant. JACKSON is wanted on a PBP arrest warrant which is located in Allegheny County for Criminal Attempt Homicide, Aggravated Assault (2 Counts), Carrying Firearm Without a License and Recklessly Endangering Another Person that was signed on March 25, 2020. Allegheny County is within the federal district of Western District of Pennsylvania (WDPA).

7. On review of the WPAFTF Investigative file on Tyrone JACKSON revealed the following:

- a. Since March 2020, PBP has conducted investigative and surveillance endeavors around Allegheny County for JACKSON to no avail. Information gleaned from confidential source (CS) interviews revealed that JACKSON is a crack cocaine and marijuana dealer that is always armed with a firearm. JACKSON's mother, Doris McCORMICK has ties and prior addresses in Detroit, MI. McCORMICK has two previous Detroit addresses of 15461 Marlowe St, Detroit, MI 48227 and 16236 Coyle St, Detroit, MI 48235. Additionally, JACKSON could also be subject to a retaliatory shooting by associates of GREENING.

8. After all of the Allegheny County locales were exhausted for JACKSON, DUSM KILEY looked into possible out of state addresses for JACKSON's relatives and associates. DUSM KILEY utilized the CP Clear database which contains subject information as well as address information from consumer reporting agencies. Two of the consumers reporting agencies are live gateway calls that will return the most up-to-date information they have for the subject. This report also includes other extensive national and state databases for a summary of assets, driver licenses, professional licenses, real properties, vehicles and much more. Using advanced search techniques, the application identifies the information that matches the subject and presents it in a comprehensive format. The CP Clear search for Doris McCORMICK (Tyrone JACKSON's mother) yielded two prior addresses of 15461 Marlowe St, Detroit, MI 48227 and 16236 Coyle St, Detroit, MI 48235. Based on JACKSON's mother having prior addresses and connections in Michigan and that he could be targeted for a retaliatory shooting; it is possible for JACKSON to flee and use the current and prior addresses associated with his mother, to violate Title 18, United States Code, Section 1073, Unlawful Flight to Avoid Prosecution.

9. JACKSON is described as follows:

Sex:	Male
Race:	Black
Date of Birth:	June 6, 2001

SSN:	176-80-1108
Height:	6'02"
Weight:	185 pounds
Eyes:	Brown
Hair:	Black

10. On June 21, 2019, a message was transmitted through the Commonwealth Law Enforcement Assistance Network (CLEAN) and the National Criminal Information Center (NCIC) with information regarding JACKSON, including the fact that an outstanding arrest warrant exists for his arrest and allows full extradition nationwide. There have been negative results to date.

11. From April 2, 2020, until the present date, the Western Pennsylvania Fugitive Task Force and Pittsburgh Bureau of Police have conducted investigative endeavors and surveillance operations for Tyrone JACKSON at all known former residences and at residences of his known associates. To date, our efforts within Pennsylvania have met with negative results.

12. On April 9, 2020, Stephen A. Zappala, Jr., District Attorney, Allegheny County advised that Allegheny County Authorities would extradite JACKSON from wherever he is apprehended within the United States.

### CONCLUSION

13. Based on the foregoing, as well as my training and experience involving fugitive investigations, including the fact that fugitives such as the target here regularly flee to an out-of-state location in an effort to avoid apprehension on serious felony charges, there is probable cause to believe that Tyrone JACKSON has travelled interstate with the intent to avoid apprehension, in violation of Title 18 United States Code, Section 1073, from on or about March 24, 2020 to the present.

The above information is true and correct to the best of my knowledge, information and belief.

/s/ Sean P. Kiley  
SEAN P. KILEY  
Task Force Officer  
U.S. Marshals Service

Subscribed and sworn to before me, via  
telephone pursuant to Fed. R. Crim. P.  
4.1(b)(2)(A), this 10<sup>th</sup> day of April,  
2020.

Cynthia R. Eddy  
HONORABLE CYNTHIA REED EDDY  
CHIEF UNITED STATES MAGISTRATE JUDGE

